Industry Observations on Application of Protocols

April 23, 2003

Public Meeting

Industry Observations

Scope and Purpose of Panel

- Discuss how the inspections were conducted and how the protocols were used

Industry Observations

- 6-8 inspectors involved in each audit
  - Regional office staff
  - State agency staff
  - OPS contractor support
- Inspections generally lasted 1 to 1.5 days
- Inspectors/OPS Headquarters stated NARI's would not be used for any OQ findings

Industry Observations

- Operators typically began inspections with a discussion/presentation of their OQ processes/approaches
- In-depth discussion of protocols and operator's plan typically followed
- OPS usually asked for a demonstration of internal recordkeeping and OQ processes
- Regulators typically caucused for 1 to 2 hours to compile findings/additional questions
- OPS then conducted close-out discussion

Industry Observations

- Generally one inspector led the protocol discussion

- Each inspector present had an opportunity to question/comment

- Attending state agencies indicated a separate headquarters inspection would not be conducted for that state

Industry Observations

- Overall, industry was pleased with the constructive and professional manner the inspectors displayed during the inspections

- Industry believed the protocols were used in the way they were intended

- Industry felt regulators were clear regarding the enforceable/not enforceable protocols

Industry Observations

- Regulators indicated that field verifications will be conducted and are anticipated to start in mid-June.

- Regulators encouraged operators to submit correspondence identifying any actions based on inspection feedback.

- Regulators focused on supporting documentation/flowcharts/roles and responsibilities.

- Regulators were very careful not to discuss best practices or operator comparisons.